

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Counsel to the Debtor
and Debtor in Possession

In re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21-16520 (JNP)

HEARING DATE AND TIME:
October 5, 2021 at 11:00 a.m. (ET)

**NOTICE OF DEBTOR'S MOTION FOR THE ENTRY OF AN ORDER EXTENDING
THE DEADLINE TO ASSUME OR REJECT UNEXPIRED LEASES OF
NONRESIDENTIAL REAL PROPERTY PURSUANT TO SECTION 365(d)(4) OF
THE BANKRUPTCY CODE AND FOR RELATED RELIEF**

PLEASE TAKE NOTICE that on **October 5, 2021**, at **11:00 a.m.** (Eastern Time), or as soon thereafter as counsel may be heard, Aluminum Shapes, L.L.C., the above-captioned debtor and debtor in possession (collectively, the "**Debtor**"), by and through its undersigned proposed counsel, will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, for entry of an order, substantially in the form submitted herewith, (a) extending the deadline to assume or reject unexpired leases of

nonresidential real property (collectively, the “Unexpired Leases”) pursuant to section 365(d)(4) of the Bankruptcy Code for an additional 90 days, from March 13, 2022 through and including June 11, 2022, without prejudice to the Debtor’s right to seek additional extensions of the period within which the Debtor may assume or reject the Unexpired Leases as contemplated under section 365(d)(4)(B) of the Bankruptcy Code; and (b) granting related relief (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the Debtor shall rely upon the Motion submitted concurrently herewith and the *Declaration of Jordan Meyers in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 17] (the “First Day Declaration”). The Debtor submits that no separate memorandum of law is necessary because the applicable law is adequately set forth in the supporting Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby waived unless timely objection is received.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is

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submitted herewith and made part of the Motion herein.

Respectfully Submitted,

Dated: September 14, 2021

By: /s/ Edmond M. George

Edmond M. George, Esquire

Michael D. Vagnoni, Esquire (*pro hac vice*)

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